

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SURESH BALACHANDRAN,

Plaintiff,

v.

VALVTECHNOLOGIES, INC.,

Defendant.

§
§
§
§
§
§
§
§

CIVIL ACTION NO.: 4:20-CV-1078

JOINT STIPULATION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Suresh Balachandran and Defendant ValvTechnologies, Inc. jointly stipulate and agree, subject to the Court's approval, that Plaintiff's claim for recovery of attorney's fees shall be resolved, if necessary, following trial on the merits pursuant to the procedures set forth in Rule 54(d) of the Federal Rules of Civil Procedure.

The parties further stipulate and agree that following trial on the merits, if necessary, they shall submit to the Court a proposed briefing schedule for (1) Defendant's brief in response to any motion filed by Plaintiff requesting an attorney fee award, and (2) Plaintiff's reply in support of any such motion. The parties' proposed briefing schedule will incorporate time sufficient to facilitate depositions, if requested, of any expert witnesses the parties might designate on the subject of attorney's fees.

Respectfully submitted,

/s/ Kell A. Simon*

KELL A. SIMON
State Bar No. 24060888
Southern District ID No. 827915
kell@kellsimonlaw.com
THE LAW OFFICES OF KELL A. SIMON
501 North IH-35, Suite 111
Austin, Texas 78702
(512) 898-9662 Telephone
(512) 368-9144 Facsimile

**ATTORNEYS FOR PLAINTIFF
SURESH BALACHANDRAN**

/s/ Jason S. Luter

JASON S. LUTER
ATTORNEY-IN-CHARGE
State Bar No. 24054069
Southern District ID No. 1373880
jason.luter@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH LLP
1717 Main Street, Suite 5400
Dallas, Texas 75201
(469) 357-2500 (Telephone)
(469) 327-0860 (Facsimile)

OF COUNSEL:

D. ALEXANDER HARRELL
State Bar No. 24055624
Southern District ID No. 928680
alex.harrell@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH LLP
1717 Main Street, Suite 5400
Dallas, Texas 75201
(469) 357-2500 (Telephone)
(469) 327-0860 (Facsimile)

ADRIANA FIGUEROA
Indiana Bar No. 33776-49
(Pro Hac Vice)
FAEGRE DRINKER BIDDLE & REATH LLP
300 N. Meridian Street, Suite 2500
Indianapolis, Indiana 46204
(317) 237-0300 (Telephone)
(317) 569-9600 (Facsimile)

**ATTORNEYS FOR DEFENDANT
VALVTECHNOLOGIES, INC.**

**Signed with permission by D. Alexander Harrell*

CERTIFICATE OF SERVICE

I certify that on December 14, 2020, a true and correct copy of the foregoing document was served on all counsel-of-record in accordance with the Federal Rules of Civil Procedure.

/s/ D. Alexander Harrell
D. ALEXANDER HARRELL